

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

**IN RE: REALPAGE, INC., RENTAL
SOFTWARE ANTITRUST LITIGATION
(NO. II)**

**Case No. 3:23-MD-3071
MDL No. 3071**

**This Document Relates to:
ALL CASES**

Chief Judge Waverly D. Crenshaw, Jr.

**MISSION ROCK RESIDENTIAL, LLC'S
ANSWER TO PLAINTIFF'S AMENDED COMPLAINT**

Defendant Mission Rock Residential, LLC ("Mission Rock") hereby responds to the corresponding paragraphs of the Amended Complaint of Plaintiffs Jason Goldman, Jeffrey Weaver, Billie Jo White, Nancy Alexander, Brandon Watters, Priscilla Parker, Barry Amar-Hoover, Joshua Kabisch, Meghan Cherry, Selena Vincin, and Maya Haynes, individually and on behalf of all others similarly situated (collectively, "Plaintiffs") as follows:

INTRODUCTION

ANSWER TO PARAGRAPH 1: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 2: Mission Rock admits that RealPage develops various software, including the products identified in this paragraph. Mission Rock admits that it is a property manager of various multifamily residential apartment buildings that implemented RealPage's Revenue Management Solutions. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 3: Mission Rock admits that it is a Managing Defendant, as defined by Plaintiffs in their Complaint, and operates as a property manager for multiple properties that utilize RealPage's RMS. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 4: Mission Rock admits the paragraph selectively quotes from an external source, which speaks for itself, and Mission Rock denies any attempt at characterization. Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 5: Mission Rock admits that it provided information regarding its multifamily rental units, including private and sensitive information, to RealPage. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 6: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 7: Mission Rock admits the paragraph selectively quotes from various external sources, which speak for themselves, and Mission Rock denies any attempt at characterization. Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 8: Mission Rock denies the allegations in this paragraph.

II. BACKGROUND

ANSWER TO PARAGRAPH 9: Mission Rock admits the paragraph selectively quotes from various external sources, which speak for themselves, and Mission Rock denies any attempt at characterization. Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 10: Mission Rock admits the paragraph selectively quotes from an external source, which speaks for itself, and Mission Rock denies any attempt at characterization. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 11: Mission Rock lacks sufficient information to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 12: Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 13: Mission Rock lacks sufficient information to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 14: Mission Rock admits that it paid an agreed upon sum to RealPage for use of RMS at its multifamily properties. Mission Rock lacks sufficient information to admit or deny the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 15: Mission Rock denies that it adopts RMS pricing recommendations up to 80%-90% of the time. Mission Rock admits the paragraph selectively quotes from an external source, which speaks for itself, and Mission Rock denies any attempt at characterization. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 16: Mission Rock admits the paragraph selectively quotes from an external source, which speaks for itself, and Mission Rock denies any attempt at characterization. Mission Rock denies the remaining allegations in this paragraph..

ANSWER TO PARAGRAPH 17: Mission Rock admits the paragraph selectively quotes from various external sources, which speak for themselves, and Mission Rock denies any attempt at characterization. Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph..

ANSWER TO PARAGRAPH 18: Mission Rock lacks sufficient information to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 19: Mission Rock lacks sufficient information to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 20: Mission Rock lacks sufficient information to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 21: Mission Rock admits the paragraph selectively quotes from various external sources, which speak for themselves, and Mission Rock denies any attempt at characterization. Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 22: Mission Rock lacks sufficient information to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 23: Mission Rock admits the paragraph selectively quotes from various external sources, which speak for themselves, and Mission Rock denies any attempt at characterization. Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 24: Mission Rock admits the paragraph selectively quotes from various external sources, which speak for themselves, and Mission Rock denies any attempt at characterization. Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 25: Mission Rock lacks sufficient information to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 26: Mission Rock admits the paragraph selectively quotes from an external source, which speaks for itself, and Mission Rock denies any attempt at characterization. Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 27: Mission Rock admits the paragraph selectively quotes from various external sources, which speak for themselves, and Mission Rock denies any attempt at characterization. Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 28: Mission Rock lacks sufficient information to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 29: Mission Rock lacks sufficient information to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 30: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 31: Mission Rock denies engaging in the scheme set forth in this paragraph in general. Mission Rock specifically denies that it set rental prices in coordination or with any illicit or improper knowledge of co-defendants' strategy in setting rental prices. Mission Rock denies that the RealPage RMS product works in the manner, or for the purpose, described here. Mission Rock lacks sufficient information to admit or deny the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 32: Mission Rock admits that, generally, when supply is higher than demand, it will take this factor into account when deciding upon rental prices. Mission Rock admits that high occupancy may be one goal, among many others, that Mission Rock considers when setting apartment pricing, with and without the assistance of software such as RMS. Except as expressly admitted, Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 33: Mission Rock admits the paragraph selectively quotes from an external source, which speaks for itself, and Mission Rock denies any attempt at characterization. Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 34: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 35: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 36: Mission Rock lacks sufficient information to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 37: On information and belief, Mission Rock admits that RealPage facilitates, manages, or hosts certain events described in this paragraph. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 38: Mission Rock lacks sufficient information to admit or deny the allegations regarding statements made by other individuals about RealPage's RMS. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 39: Mission Rock admits the paragraph selectively quotes from various external sources, which speak for themselves, and Mission Rock denies any attempt at characterization. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 40: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 41: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 42: Mission Rock admits the paragraph selectively quotes from an article, which speaks for itself, and Mission Rock denies any attempt at characterization. Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph..

ANSWER TO PARAGRAPH 43: Mission Rock denies the allegations in this paragraph.

III. JURISDICTION AND VENUE

ANSWER TO PARAGRAPH 44: Mission Rock admits that Plaintiffs brought this class action lawsuit under the statutes identified in this paragraph. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 45: Mission Rock admits the allegations in this paragraph.

ANSWER TO PARAGRAPH 46: Mission Rock admits the allegations in this paragraph.

ANSWER TO PARAGRAPH 47: Mission Rock lacks sufficient knowledge to admit or deny the allegations regarding other Defendants. Mission Rock admits the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 48: Mission Rock denies that it has engaged in a conspiracy with other Defendants, and thus denies that it is, or has, co-conspirators. Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph regarding other Defendants. Mission Rock admits the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 49: Mission Rock lacks sufficient knowledge to admit or deny whether a more convenient forum exists for any other party or witness. Mission Rock denies the remaining allegations in this paragraph.

IV. THE PARTIES

ANSWER TO PARAGRAPH 50: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 51: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 52: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 53: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 54: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 55: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 56: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 57: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 58: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 59: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 60: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 61: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 62: Mission Rock lacks sufficient information to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 63: Mission Rock lacks sufficient information to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 64: Mission Rock lacks sufficient information to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 65: Mission Rock lacks sufficient information to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 66: Mission Rock lacks sufficient information to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 67: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 68: Mission Rock lacks sufficient knowledge to admit or deny the allegations regarding Defendant AIR's acts or omissions. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 69: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 70: Mission Rock lacks sufficient knowledge to admit or deny the allegations regarding Defendant Allied Orion's acts or omissions. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 71: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 72: Mission Rock lacks sufficient knowledge to admit or deny the allegations regarding Defendant AMC's acts or omissions. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 73: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 74: Mission Rock lacks sufficient knowledge to admit or deny the allegations regarding Defendant Avenue5's acts or omissions. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 75: Mission Rock lacks sufficient knowledge to admit or deny the allegations regarding Defendant Avenue5's acts or omission. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 76: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 77: Mission Rock lacks sufficient knowledge to admit or deny the allegations regarding Defendant Bell Partners's acts or omissions. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 78: Mission Rock lacks sufficient knowledge to admit or deny the allegations regarding Defendant Bell Partners's acts or omissions. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 79: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 80: Mission Rock lacks sufficient knowledge to admit or deny the allegations regarding Defendant BH's acts or omissions. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 81: Mission Rock lacks sufficient knowledge to admit or deny the allegations regarding Defendant BH's acts or omissions. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 82: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 83: Mission Rock lacks sufficient knowledge to admit or deny the allegations regarding Defendant Bozzuto's acts or omissions. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 84: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 85: Mission Rock lacks sufficient knowledge to admit or deny the allegations regarding Defendant Brookfield's acts or omissions. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 86: Mission Rock lacks sufficient knowledge to admit or deny the allegations regarding Defendant Brookfield's acts or omissions. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 87: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 88: Mission Rock lacks sufficient knowledge to admit or deny the allegations regarding Defendant Camden's acts or omissions. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 89: Mission Rock lacks sufficient knowledge to admit or deny the allegations regarding Defendant Camden's acts or omissions. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 90: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 91: Mission Rock lacks sufficient knowledge to admit or deny the allegations regarding Defendant Carter-Henson's acts or omissions and its involvement in the alleged conspiracy. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 92: Mission Rock lacks sufficient knowledge to admit or deny the allegations regarding Defendant Camden's acts or omissions. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 93: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 94: Mission Rock lacks sufficient knowledge to admit or deny the allegations regarding Defendant CONAM's acts or omissions. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 95: Mission Rock lacks sufficient knowledge to admit or deny the allegations regarding Defendant CONAM's acts or omissions. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 96: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 97: Mission Rock lacks sufficient knowledge to admit or deny the allegations regarding Defendant CONTI's acts or omissions. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 98: Mission Rock lacks sufficient knowledge to admit or deny the allegations regarding Defendant CONTI's acts or omissions. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 99: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 100: Mission Rock lacks sufficient knowledge to admit or deny the allegations regarding Defendant Cortland's acts or omissions. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 101: Mission Rock lacks sufficient knowledge to admit or deny the allegations regarding Defendant Cortland's acts or omissions. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 102: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 103: Mission Rock lacks sufficient knowledge to admit or deny the allegations regarding Defendant CWS's acts or omissions. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 104: Mission Rock lacks sufficient knowledge to admit or deny the allegations regarding Defendant CWS's acts or omissions. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 105: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 106: Mission Rock lacks sufficient knowledge to admit or deny the allegations regarding Defendant Dayrise's acts or omissions. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 107: Mission Rock lacks sufficient knowledge to admit or deny the allegations regarding Defendant Dayrise's acts or omissions. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 108: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 109: Mission Rock lacks sufficient knowledge to admit or deny the allegations regarding Defendant ECI's acts or omissions. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 110: Mission Rock lacks sufficient knowledge to admit or deny the allegations regarding Defendant ECI's acts or omissions. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 111: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 112: Mission Rock lacks sufficient knowledge to admit or deny the allegations regarding Defendant Equity's acts or omissions. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 113: Mission Rock lacks sufficient knowledge to admit or deny the allegations regarding Defendant Equity's acts or omissions. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 114: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 115: Mission Rock lacks sufficient knowledge to admit or deny the allegations regarding Defendant Essex's acts or omissions. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 116: Mission Rock lacks sufficient knowledge to admit or deny the allegations regarding Defendant Essex's acts or omissions. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 117: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 118: Mission Rock lacks sufficient knowledge to admit or deny the allegations regarding Defendant First Communities's acts or omissions. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 119: Mission Rock lacks sufficient knowledge to admit or deny the allegations regarding Defendant First Communities's acts or omissions. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 120: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 121: Mission Rock lacks sufficient knowledge to admit or deny the allegations regarding Defendant FPI Management's acts or omissions. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 122: Mission Rock lacks sufficient knowledge to admit or deny the allegations regarding Defendant FPI Management's acts or omissions. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 123: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 124: Mission Rock lacks sufficient knowledge to admit or deny the allegations regarding Defendant Greystar's acts or omissions. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 125: Mission Rock lacks sufficient knowledge to admit or deny the allegations regarding Defendant Greystar's acts or omissions. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 126: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 127: Mission Rock lacks sufficient knowledge to admit or deny the allegations regarding Defendant Highmark's acts or omissions. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 128: Mission Rock lacks sufficient knowledge to admit or deny the allegations regarding Defendant Highmark's acts or omissions. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 129: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 130: Mission Rock lacks sufficient knowledge to admit or deny the allegations regarding Defendant IRT's acts or omissions. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 131: Mission Rock lacks sufficient knowledge to admit or deny the allegations regarding Defendant IRT's acts or omissions. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 132: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 133: Mission Rock lacks sufficient knowledge to admit or deny the allegations regarding Defendant Kairoi's acts or omissions. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 134: Mission Rock lacks sufficient knowledge to admit or deny the allegations regarding Defendant Kairoi's acts or omissions. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 135: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 136: Mission Rock lacks sufficient knowledge to admit or deny the allegations regarding Defendant Knightvest's acts or omissions. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 137: Mission Rock lacks sufficient knowledge to admit or deny the allegations regarding Defendant Knightvest's acts or omissions. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 138: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 139: Mission Rock lacks sufficient knowledge to admit or deny the allegations regarding Defendant Lantower's acts or omissions. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 140: Mission Rock lacks sufficient knowledge to admit or deny the allegations regarding Defendant Lantower's acts or omissions. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 141: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 142: Mission Rock lacks sufficient knowledge to admit or deny the allegations regarding Defendant Lincoln's acts or omissions. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 143: Mission Rock lacks sufficient knowledge to admit or deny the allegations regarding Defendant Lincoln's acts or omissions. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 144: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 145: Mission Rock lacks sufficient knowledge to admit or deny the allegations regarding Defendant MAA's acts or omissions. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 146: Mission Rock lacks sufficient knowledge to admit or deny the allegations regarding Defendant MAA's acts or omissions. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 147: Mission Rock denies that it is one of the largest managers of multifamily rental real estate in the United States and denies that it operates in the San Francisco submarket, as defined by Plaintiffs in their Complaint. To the extent the "Washington" submarket refers to the "District of Columbia" submarket, as defined by Plaintiffs in their Complaint, Mission Rock admits that allegation. Mission Rock otherwise admits the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 148: Mission Rock admits that it uses RealPage's RMS to manage some of its multifamily rental units. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 149: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 150: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 151: Mission Rock lacks sufficient knowledge to admit or deny the allegations regarding Defendant Morgan's acts or omissions. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 152: Mission Rock lacks sufficient knowledge to admit or deny the allegations regarding Defendant Morgan's acts or omissions. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 153: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 154: Mission Rock lacks sufficient knowledge to admit or deny the allegations regarding Defendant Pinnacle's acts or omissions. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 155: Mission Rock lacks sufficient knowledge to admit or deny the allegations regarding Defendant Pinnacle's acts or omissions. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 156: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 157: Mission Rock lacks sufficient knowledge to admit or deny the allegations regarding Defendant Prometheus's acts or omissions. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 158: Mission Rock lacks sufficient knowledge to admit or deny the allegations regarding Defendant Prometheus's acts or omissions. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 159: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 160: Mission Rock lacks sufficient knowledge to admit or deny the allegations regarding Defendant Related's acts or omissions. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 161: Mission Rock lacks sufficient knowledge to admit or deny the allegations regarding Defendant Related's acts or omissions. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 162: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 163: Mission Rock lacks sufficient knowledge to admit or deny the allegations regarding Defendant Rose's acts or omissions. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 164: Mission Rock lacks sufficient knowledge to admit or deny the allegations regarding Defendant Rose's acts or omissions. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 165: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 166: Mission Rock lacks sufficient knowledge to admit or deny the allegations regarding Defendant RPM's acts or omissions. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 167: Mission Rock lacks sufficient knowledge to admit or deny the allegations regarding Defendant RPM's acts or omissions. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 168: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 169: Mission Rock lacks sufficient knowledge to admit or deny the allegations regarding Defendant Sares Regis's acts or omissions. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 170: Mission Rock lacks sufficient knowledge to admit or deny the allegations regarding Defendant Sares Regis's acts or omissions. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 171: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 172: Mission Rock lacks sufficient knowledge to admit or deny the allegations regarding Defendant Security's acts or omissions. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 173: Mission Rock lacks sufficient knowledge to admit or deny the allegations regarding Defendant Security's acts or omissions. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 174: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 175: Mission Rock lacks sufficient knowledge to admit or deny the allegations regarding Defendant Sherman's acts or omissions. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 176: Mission Rock lacks sufficient knowledge to admit or deny the allegations regarding Defendant Sherman's acts or omissions. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 177: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 178: Mission Rock lacks sufficient knowledge to admit or deny the allegations regarding Defendant Simpson's acts or omissions. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 179: Mission Rock lacks sufficient knowledge to admit or deny the allegations regarding Defendant Simpson's acts or omissions. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 180: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 181: Mission Rock lacks sufficient knowledge to admit or deny the allegations regarding Defendant Thrive's acts or omissions. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 182: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 183: Mission Rock lacks sufficient knowledge to admit or deny the allegations regarding Defendant Trammell Crow's acts or omissions. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 184: Mission Rock lacks sufficient knowledge to admit or deny the allegations regarding Defendant Trammell Crow's acts or omissions. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 185: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 186: Mission Rock lacks sufficient knowledge to admit or deny the allegations regarding Defendant UDR's acts or omissions. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 187: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 188: Mission Rock lacks sufficient knowledge to admit or deny the allegations regarding Defendant Windsor's acts or omissions. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 189: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 190: Mission Rock lacks sufficient knowledge to admit or deny the allegations regarding Defendant Winn's acts or omissions. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 191: Mission Rock lacks sufficient knowledge to admit or deny the allegations regarding Defendant Winn's acts or omissions. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 192: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 193: Mission Rock lacks sufficient knowledge to admit or deny the allegations regarding Defendant ZRS's acts or omissions. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 194: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 195: To the extent this paragraph states legal conclusions, responsive pleadings are not necessary. Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 196: To the extent this paragraph states defining terms, no responsive pleading is necessary. Mission Rock lacks denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 197: To the extent this paragraph states defining terms, no responsive pleading is necessary. Mission Rock lacks denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 198: To the extent this paragraph states defining terms, no responsive pleading is necessary. Mission Rock lacks denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 199: To the extent this paragraph states defining terms, no responsive pleading is necessary. Mission Rock lacks denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 200: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 201: Mission Rock lacks sufficient information to admit or deny the allegations in this paragraph.

V. FACTUAL ALLEGATIONS

A. Historical Competition Among Residential Property Managers.

ANSWER TO PARAGRAPH 202: Mission Rock admits that occupancy rate is one factor that Mission Rock considers when pricing its rental units, but denies the allegation that occupancy rates were the sole or primary factor it considered when deciding rental unit pricing. Mission Rock lacks sufficient knowledge to admit or deny the allegation that all property owners and managers were solely motivated by occupancy rates. Unless expressly admitted, Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 203: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 204: Mission Rock lacks sufficient information to admit or deny the allegations regarding statements made by other individuals about rental software. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 205: Mission Rock denies the allegations set forth in this paragraph.

ANSWER TO PARAGRAPH 206: Mission Rock lacks sufficient information to admit or deny the allegations regarding statements made by other individuals about rental pricing software. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 207: Mission Rock lacks sufficient information to admit or deny the allegations regarding statements made by other individuals about RealPage's RMS. Mission Rock denies the remaining allegations in this paragraph.

B. Evolution of RealPage's Revenue Management Solutions.

ANSWER TO PARAGRAPH 208: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 209: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 210: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 211: Mission Rock lacks sufficient information to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 212: Mission Rock denies that real property owners and managers worked in concert to raise rents. Mission Rock lacks sufficient information to admit or deny the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 213: Mission Rock lacks sufficient information to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 214: Mission Rock lacks sufficient information to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 215: Mission Rock admits that paragraph selectively quotes from an article, which speaks for itself, and Mission Rock denies any attempt at characterization. Mission Rock lacks sufficient knowledge to admit or deny the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 216: Mission Rock admits the paragraph selectively quotes from a press release and other public reports from RealPage, which speaks for themselves, and Mission Rock denies any attempt at characterization. Mission Rock lacks sufficient knowledge to admit or deny the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 217: Mission Rock admits the paragraph selectively quotes from an article, which speaks for itself, and Mission Rock denies any attempt at characterization. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 218: Mission Rock admits the paragraph selectively quotes from various external sources, which speaks for themselves, and Mission Rock denies any attempt at characterization. Mission Rock lacks sufficient knowledge to admit or deny the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 219: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 220: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 221: Mission Rock admits the paragraph selectively quotes from various external sources, which speaks for themselves, and Mission Rock denies any attempt at characterization. Except as expressly admitted, Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 222: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 223: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 224: Mission Rock admits the paragraph selectively quotes various external sources, which speak for themselves, and Mission Rock denies any attempt at characterization. Except as expressly admitted, Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 225: Mission Rock admits the paragraph selectively quotes a video on RealPage's website, which speaks for itself, and Mission Rock denies any attempt at characterization. Except as expressly admitted, Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 226: Mission Rock admits that the diagram is from RealPage's website, which speaks for itself, and Mission Rock denies any attempt at characterization. Except as expressly admitted, Mission Rock denies the allegations in this paragraph.

C. Property Management Companies Effectively Outsourced Pricing and Supply Decisions to RealPage, Eliminating Competition.

ANSWER TO PARAGRAPH 227: Mission Rock admits that it provides various data to RealPage. Mission Rock denies that it provides this information knowing that it is being shared with Mission Rock's competitors. Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph pertaining to other Defendants. Except as expressly admitted, Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 228: Mission Rock admits the paragraph selectively cites from a DOJ guideline, which speaks for itself, and Mission Rock denies any attempt at characterization. Mission Rock denies the allegation that it agrees to share any information with its competitors. Mission Rock lacks sufficient knowledge to admit or deny the allegations with regard to other Defendants. Except as expressly admitted, Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 229: Mission Rock admits the paragraph selectively cites from a DOJ guideline, which speaks for itself, and Mission Rock denies any attempt at characterization.

ANSWER TO PARAGRAPH 230: Mission Rock admits the paragraph selectively cites various sources available on RealPage's website, which speaks for themselves, and Mission Rock denies any attempt at characterization. Mission Rock lacks sufficient knowledge to admit or deny the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 231: Mission Rock denies the allegation in this paragraph.

ANSWER TO PARAGRAPH 232: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 233: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 234: Mission Rock admits the paragraph selectively cites various sources, which speaks for themselves, and Mission Rock denies any attempt at characterization. Mission Rock denies the remaining allegation in this paragraph.

ANSWER TO PARAGRAPH 235: Mission Rock admits the paragraph selectively cites various sources, which speaks for themselves, and Mission Rock denies any attempt at characterization. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 236: Mission Rock admits the paragraph cites a RealPage earnings call, which speaks for itself, and Mission Rock denies any attempt at characterization. Mission Rock denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 237: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 238: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 239: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 240: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 241: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 242: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 243: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 244: Mission Rock denies the allegation in this paragraph.

ANSWER TO PARAGRAPH 245: Mission Rock denies the allegation in this paragraph.

ANSWER TO PARAGRAPH 246: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 247: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 248: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 249: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 250: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 251: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 252: Mission Rock admits the paragraph selectively cites various sources, which speaks for themselves, and Mission Rock denies any attempt at characterization. Mission Rock lacks sufficient knowledge to admit or deny the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 253: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 254: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

D. Defendants Collectively Monitor Compliance with the Scheme.

ANSWER TO PARAGRAPH 255: Mission Rock denies the allegation that a conspiracy exists. Mission Rock otherwise lacks sufficient knowledge to admit or deny the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 256: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 257: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 258: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 259: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 260: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 261: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 262: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 263: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 264: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 265: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 266: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 267: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 268: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 269: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 270: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 271: Mission Rock lacks sufficient knowledge to admit or deny the allegations regarding statements made by other individuals about RealPage's RMS. Mission Rock otherwise denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 272: Mission Rock lacks sufficient knowledge to admit or deny the allegations regarding statements made by other individuals about RealPage's RMS. Mission Rock otherwise denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 273: Mission Rock denies there is a cartel, lacks sufficient knowledge to admit or deny the allegations in this paragraph as statements or conduct of others, admits that Lease Compliance Reports exist and provide certain data, but otherwise denies the allegations of this paragraph.

ANSWER TO PARAGRAPH 274: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 275: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 276: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 277: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 278: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 279: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 280: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 281: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 282: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 283: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 284: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 285: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 286: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

E. Property Owners and Managers Who Adopted RealPage's Pricing Recommendations Did So With the Common Goal of Raising Rent Prices Which Caused Inflated Rental Prices and Reduced Occupancy Levels in Their Respective Metro Areas.

ANSWER TO PARAGRAPH 287: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 288: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 289: Mission Rock denies the existence of any conspiracy, denies that it commits to using non-public data from competitors to price its own units, and otherwise lacks sufficient knowledge to admit or deny the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 290: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 291: Mission Rock denies the allegation that RealPage's RMS permits Mission Rock to operate as "one company setting prices" with other Defendants. Mission Rock otherwise lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 292: Mission Rock admits the paragraph selectively cites various sources, which speaks for themselves, and Mission Rock denies any attempt at characterization. Mission Rock otherwise denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 293: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 294: Mission Rock admits the paragraph selectively cites an external source, which speaks for itself, and Mission Rock denies any attempt at characterization. Mission Rock otherwise denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 295: Mission Rock admits the paragraph selectively cites an external source, which speaks for itself, and Mission Rock denies any attempt at characterization. Mission Rock otherwise denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 296: Mission Rock admits the paragraph selectively cites an external source, which speaks for itself, and Mission Rock denies any attempt at characterization. Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 297: Mission Rock admits the paragraph selectively cites an external source, which speaks for itself, and Mission Rock denies any attempt at characterization. Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 298: Mission Rock admits the paragraph selectively cites an external source, which speaks for itself, and Mission Rock denies any attempt at characterization. Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 299: Mission Rock admits the paragraph selectively cites an external source, which speaks for itself, and Mission Rock denies any attempt at characterization. Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 300: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 301: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 302: Mission Rock admits the paragraph selectively cites an external source, which speaks for itself, and Mission Rock denies any attempt at characterization. Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 303: Mission Rock admits the paragraph selectively cites an external source, which speaks for itself, and Mission Rock denies any attempt at characterization. Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 304: Mission Rock denies that it is a member of a cartel to fix prices and denies the allegations in the first sentence of this paragraph as to itself. Mission Rock lacks sufficient knowledge to admit or deny the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 305: Mission Rock admits the paragraph selectively cites an external source, which speaks for itself, and Mission Rock denies any attempt at characterization. Mission Rock otherwise denies the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 306: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 307: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 308: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 309: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 310: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 311: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 312: Mission Rock denies the allegations in this paragraph.

F. Property Owners and Managers Conspired Through Trade Associations to Standardize Lease Terms Unfavorable to Plaintiffs and Members of the Class.

ANSWER TO PARAGRAPH 313: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 314: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 315: Mission Rock admits the paragraph selectively cites an external source, which speaks for itself, and Mission Rock denies any attempt at characterization. Mission Rock otherwise lacks sufficient knowledge to admit or deny the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 316: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 317: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 318: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 319: Mission Rock admits the paragraph selectively cites an external source, which speaks for itself, and Mission Rock denies any attempt at characterization. Mission Rock otherwise lacks sufficient knowledge to admit or deny the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 320: Mission Rock admits that it is a member of NAA. Mission Rock lacks sufficient knowledge to admit or deny the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 321: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 322: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 323: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 324: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 325: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 326: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 327: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 328: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 329: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 330: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 331: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

G. Preliminary Economic Analysis Confirms the Impact of RealPage's Revenue Management on Multifamily Rental Markets Nationwide.

i. Defendants' Increased Revenues Resulted from Proportionally Higher, Artificially Inflated Rent Increases.

ANSWER TO PARAGRAPH 332: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 333: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 334: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 335: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ii. Owners, Owner-Operators, and Managing Defendants Engaged in Tacit Collusion to Artificially Increase Multifamily Rental Prices.

ANSWER TO PARAGRAPH 336: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 337: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 338: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 339: Mission Rock admits that it operates in the Nashville submarket, as defined by Plaintiffs in their Complaint. Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph with regard to other Defendants.

ANSWER TO PARAGRAPH 340: Mission Rock admits that it operates in the Atlanta submarket, as defined by Plaintiffs in their Complaint. Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph with regard to other Defendants.

ANSWER TO PARAGRAPH 341: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 342: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 343: Mission Rock admits that it operates in the Denver submarket, as defined by Plaintiffs in their Complaint. Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph with regard to other Defendants.

ANSWER TO PARAGRAPH 344: Mission Rock admits that it operates in District of Columbia submarket, as defined by Plaintiffs in their Complaint. Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph with regard to other Defendants.

ANSWER TO PARAGRAPH 345: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 346: Mission Rock admits that it operates in Portland submarket, as defined by Plaintiffs in their Complaint. Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph with regard to other Defendants.

ANSWER TO PARAGRAPH 347: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 348: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 349: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 350: Mission Rock denies the allegations in this paragraph.

iii. Supply and Demand Factors Do Not Explain Inflated Rental Prices.

ANSWER TO PARAGRAPH 351: On information and belief, Mission Rock admits the allegations in this paragraph.

ANSWER TO PARAGRAPH 352: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 353: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 354: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

iv. Atlanta Submarket.

ANSWER TO PARAGRAPH 355: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 356: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 357: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 358: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 359: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 360: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

v. Orlando Submarket.

ANSWER TO PARAGRAPH 361: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

vi. Phoenix Submarket.

ANSWER TO PARAGRAPH 362: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

vii. Fort Worth (Dallas Submarket).

ANSWER TO PARAGRAPH 363: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 364: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 365: Mission Rock denies the allegations in this paragraph.

H. “Plus Factors” in the Multifamily Rental Housing Market Provide Additional Evidence of a Price Fixing Conspiracy.

ANSWER TO PARAGRAPH 366: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 367: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 368: Mission Rock denies the allegation in this paragraph.

i. The Multifamily Rental Market Is Highly Concentrated.

ii. High Barriers to Entry.

ANSWER TO PARAGRAPH 369: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 370: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 371: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

iii. High Switching Costs for Renters.

ANSWER TO PARAGRAPH 372: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph but affirmatively responds that this allegation is directly contrary to the allegations of paragraph 252 regarding increased turnover rates.

ANSWER TO PARAGRAPH 373: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 374: Mission Rock denies the allegations in this paragraph..

iv. Inelasticity of Demand.

ANSWER TO PARAGRAPH 375: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 376: Mission Rock denies the allegations in this paragraph.

v. Multifamily Rental Housing Units Are a Fungible Product.

ANSWER TO PARAGRAPH 377: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 378: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 379: Mission Rock admits the paragraph selectively cites an external source, which speaks for itself, and Mission Rock denies any attempt at characterization. Mission Rock otherwise lacks sufficient knowledge to admit or deny the remaining allegations in this paragraph.

vi. Defendants Exchange Competitively Sensitive Information.

ANSWER TO PARAGRAPH 380: Mission Rock denies the allegation that it had access to any confidential information of its competitors. Mission Rock lacks sufficient information to admit or deny the remaining allegations in this paragraph.

vii. Motive, Opportunities, and Invitations to Collude.

ANSWER TO PARAGRAPH 381: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 382: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 383: On information and belief, Mission Rock admits that RealPage sponsored meetings and other forums for engagement, but denies the allegations in this paragraph that Defendants had conspired. Except as expressly admitted, Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 384: On information and belief, Mission Rock admits that RealPage hosts online forums and in-person conferences but denies that its standing committees are made of “cartel members” who provide opportunities for direct collusion. Except as expressly admitted, Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 385: On information and belief, Mission Rock admits that RealPage hosts an annual conference but denies that the intent of this conference is to provide a forum for Defendants, including Mission Rock, to collude. Except as expressly admitted, Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 386: Mission Rock admits that Mission Rock employees and representatives have attended events sponsored by the National Multifamily Housing Counsel, but

denies the allegation that industry trade associations facilitate opportunities to conspire by hosting meetings and other forums. Except as expressly admitted, Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 387: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 388: Mission Rock admits that it has been a member of the NAA, but lacks sufficient knowledge to admit or deny the allegations regarding made by other individuals about statements made regarding the NAA. Except as expressly admitted, Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 389: Mission Rock denies there is a cartel but otherwise lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 390: On information and belief, Mission Rock admits the allegations in this paragraph.

ANSWER TO PARAGRAPH 391: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

VI. RELEVANT MARKET

ANSWER TO PARAGRAPH 392: To the extent the allegations in this paragraph are legal conclusions, no responsive pleading is required. Insofar as any responsive pleading is required, Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 393: Mission Rock denies the allegations in this paragraph.

A. The Relevant Product Market Is Multifamily Residential Real Estate Leases.

ANSWER TO PARAGRAPH 394: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 395: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 396: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 397: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 398: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 399: Mission Rock denies the allegations in this paragraph.

B. Defendants' Market Power in the Multifamily Residential Real Estate Market.

ANSWER TO PARAGRAPH 400: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 401: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 402: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 403: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 404: Mission Rock denies the allegations in this paragraph.

C. Regional Submarkets

ANSWER TO PARAGRAPH 405: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 406: Mission Rock admits that it operates in multiple regions across the country. Mission Rock lacks sufficient knowledge to admit or deny the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 407: On information and belief, Mission Rock admits the allegations in this paragraph.

ANSWER TO PARAGRAPH 408: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 409: Mission Rock denies the allegations in this paragraph.

i. Nashville, Tennessee

ANSWER TO PARAGRAPH 410: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 411: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 412: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 413: Mission Rock admits that it operates in the Nashville, Tennessee submarket, as defined by Plaintiffs in their Complaint. Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 414: Mission Rock denies that any rent increases in the Nashville, Tennessee submarket were caused by Mission Rock and other Defendants' adoption of RealPage's RMS.

ANSWER TO PARAGRAPH 415: Mission Rock denies there is a cartel but otherwise lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ii. Atlanta, Georgia

ANSWER TO PARAGRAPH 416: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 417: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 418: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 419: Mission Rock admits that it operates in the Atlanta submarket, as defined by Plaintiffs in their Complaint. Mission Rock lacks sufficient knowledge to admit or deny the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 420: Mission Rock denies that any rental increases were caused by Mission Rock and other Defendants' adoption of RealPage's RMS.

ANSWER TO PARAGRAPH 421: Mission Rock denies there is a cartel but otherwise lacks sufficient knowledge to admit or deny the allegations in this paragraph.

iii. Austin, Texas

ANSWER TO PARAGRAPH 422: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 423: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 424: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 425: Mission Rock admits that it operates in the Austin, Texas submarket, as defined by Plaintiffs in their Complaint. Mission Rock lacks sufficient knowledge to admit or deny the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 426: Mission Rock denies that any rental increases in the Austin, Texas submarket were caused by Mission Rock and other Defendants' adoption of RealPage's RMS.

ANSWER TO PARAGRAPH 427: Mission Rock denies there is a cartel but otherwise lacks sufficient knowledge to admit or deny the allegations in this paragraph.

iv. Baltimore, Maryland

ANSWER TO PARAGRAPH 428: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 429: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 430: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 431: Mission Rock admits that it operates in the Baltimore, Maryland submarket, as defined by Plaintiffs in their Complaint. Mission Rock lacks sufficient knowledge to admit or deny the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 432: Mission Rock denies that any rental increases were caused by Mission Rock and other Defendants' adoption of RealPage's RMS.

ANSWER TO PARAGRAPH 433: Mission Rock denies there is a cartel but otherwise lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 434: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

v. Boston, Massachusetts

ANSWER TO PARAGRAPH 435: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 436: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 437: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 438: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 439: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 440: Mission Rock denies there is a cartel but otherwise lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 441: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

vi. Charlotte, North Carolina

ANSWER TO PARAGRAPH 442: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 443: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 444: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 445: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 446: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 447: Mission Rock denies there is a cartel but otherwise lacks sufficient knowledge to admit or deny the allegations in this paragraph.

vii. Chicago, Illinois

ANSWER TO PARAGRAPH 448: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 449: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 450: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 451: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 452: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 453: Mission Rock denies there is a cartel but otherwise lacks sufficient knowledge to admit or deny the allegations in this paragraph.

viii. Dallas, Texas

ANSWER TO PARAGRAPH 454: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 455: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 456: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 457: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 458: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 459: Mission Rock denies there is a cartel but otherwise lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ix. Denver, Colorado

ANSWER TO PARAGRAPH 460: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 461: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 462: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 463: Mission Rock admits that it operates in the Denver, Colorado submarket, as defined by Plaintiffs in their Complaint. Mission Rock lacks sufficient knowledge to admit or deny the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 464: Mission Rock denies that any rental increases in the Denver, Colorado submarket were caused by Mission Rock and other Defendants' adoption of RealPage's RMS.

ANSWER TO PARAGRAPH 465: Mission Rock denies there is a cartel but otherwise lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 466: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

x. Detroit, Michigan

ANSWER TO PARAGRAPH 467: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 468: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 469: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 470: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 471: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 472: Mission Rock denies there is a cartel but otherwise lacks sufficient knowledge to admit or deny the allegations in this paragraph.

xi. Houston, Texas

ANSWER TO PARAGRAPH 473: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 474: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 475: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 476: Mission Rock admits that it operates in the Houston, Texas submarket as defined by Plaintiffs in their Complaint. Mission Rock lacks sufficient knowledge to admit or deny the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 477: Mission Rock denies that any rental increases in the Houston, Texas submarket were caused by Mission Rock and other Defendants' adoption of RealPage's RMS.

ANSWER TO PARAGRAPH 478: Mission Rock denies there is a cartel but otherwise lacks sufficient knowledge to admit or deny the allegations in this paragraph.

xii. Jacksonville, Florida

ANSWER TO PARAGRAPH 479: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 480: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 481: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 482: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 483: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 484: Mission Rock denies there is a cartel but otherwise lacks sufficient knowledge to admit or deny the allegations in this paragraph.

xiii. Las Vegas, Nevada

ANSWER TO PARAGRAPH 485: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 486: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 487: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 488: Mission Rock admits that it operates in the Las Vegas, Nevada submarket, as defined by Plaintiffs in their Complaint. Mission Rock lacks sufficient knowledge to admit or deny the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 489: Mission Rock denies that any rental increases in the Las Vegas, Nevada submarket were caused by Mission Rock and other Defendants' adoption of RealPage's RMS.

ANSWER TO PARAGRAPH 490: Mission Rock denies there is a cartel but otherwise lacks sufficient knowledge to admit or deny the allegations in this paragraph.

xiv. Los Angeles, California

ANSWER TO PARAGRAPH 491: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 492: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 493: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 494: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 495: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 496: Mission Rock denies there is a cartel but otherwise lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 497: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

xv. Memphis, Tennessee

ANSWER TO PARAGRAPH 498: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 499: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 500: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 501: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 502: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 503: Mission Rock denies there is a cartel but otherwise lacks sufficient knowledge to admit or deny the allegations in this paragraph.

xvi. Miami, Florida

ANSWER TO PARAGRAPH 504: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 505: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 506: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 507: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 508: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 509: Mission Rock denies there is a cartel but otherwise lacks sufficient knowledge to admit or deny the allegations in this paragraph.

xvii. Milwaukee, Wisconsin

ANSWER TO PARAGRAPH 510: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 511: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 512: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 513: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 514: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 515: Mission Rock denies there is a cartel but otherwise lacks sufficient knowledge to admit or deny the allegations in this paragraph.

xviii. Minneapolis, Minnesota

ANSWER TO PARAGRAPH 516: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 517: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 518: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 519: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 520: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 521: Mission Rock denies there is a cartel but otherwise lacks sufficient knowledge to admit or deny the allegations in this paragraph.

xix. New York, New York

ANSWER TO PARAGRAPH 522: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 523: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 524: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 525: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 526: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 527: Mission Rock denies there is a cartel but otherwise lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 528: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

xx. Orlando, Florida

ANSWER TO PARAGRAPH 529: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 530: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 531: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 532: Mission Rock admits that it operates in the Orlando, Florida submarket, as defined by Plaintiffs in their Complaint. Mission Rock lacks sufficient knowledge to admit or deny the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 533: Mission Rock denies that any rental increases in the Orlando, Florida submarket were caused by Mission Rock and other Defendants' adoption of RealPage's RMS.

ANSWER TO PARAGRAPH 534: Mission Rock denies there is a cartel but otherwise lacks sufficient knowledge to admit or deny the allegations in this paragraph.

xxi. Philadelphia, Pennsylvania

ANSWER TO PARAGRAPH 535: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 536: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 537: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 538: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 539: Mission Rock denies there is a cartel but otherwise lacks sufficient knowledge to admit or deny the allegations in this paragraph.

xxii. Phoenix, Arizona

ANSWER TO PARAGRAPH 540: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 541: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 542: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 543: Mission Rock admits that it operates in the Phoenix, Arizona submarket, as defined by Plaintiffs in their Complaint. Mission Rock lacks sufficient knowledge to admit or deny the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 544: Mission Rock denies that any rental increases in the Phoenix, Arizona submarket were caused by Mission Rock and other Defendants' adoption of RealPage's RMS.

ANSWER TO PARAGRAPH 545: Mission Rock denies there is a cartel but otherwise lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 546: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

xxiii. Pittsburgh, Pennsylvania

ANSWER TO PARAGRAPH 547: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 548: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 549: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 550: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 551: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 552: Mission Rock denies there is a cartel but otherwise lacks sufficient knowledge to admit or deny the allegations in this paragraph.

xxiv. Portland, Oregon

ANSWER TO PARAGRAPH 553: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 554: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 555: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 556: Mission Rock admits that it operates in the Portland, Oregon submarket, as defined by Plaintiffs in their Complaint. Mission Rock lacks sufficient knowledge to admit or deny the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 557: Mission Rock denies that any rental increases in the Portland, Oregon were caused by Mission Rock and other Defendants' adoption of RealPage's RMS.

ANSWER TO PARAGRAPH 558: Mission Rock denies there is a cartel but otherwise lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 559: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

xxv. San Diego, California

ANSWER TO PARAGRAPH 560: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 561: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 562: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 563: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 564: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 565: Mission Rock denies there is a cartel but otherwise lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 566: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

xxvi. San Francisco, California

ANSWER TO PARAGRAPH 567: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 568: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 569: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 570: Mission Rock denies the allegation that it operates in the San Francisco, California submarket, as defined by Plaintiffs in their Complaint. Mission Rock lacks sufficient knowledge to admit or deny the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 571: Mission Rock denies that any rental increases in the San Francisco, California submarket were caused by Mission Rock and other Defendants' adoption of RealPage's RMS.

ANSWER TO PARAGRAPH 572: Mission Rock denies there is a cartel but otherwise lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 573: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

xxvii. San Jose, California

ANSWER TO PARAGRAPH 574: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 575: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 576: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 577: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 578: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 579: Mission Rock denies there is a cartel but otherwise lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 580: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

xxviii. Seattle, Washington

ANSWER TO PARAGRAPH 581: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 582: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 583: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 584: Mission Rock admits that it operates in the Seattle, Washington submarket, as defined by Plaintiffs in their Complaint. Mission Rock lacks sufficient knowledge to admit or deny the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 585: Mission Rock denies that any rental increases in the Seattle, Washington submarket were caused by Mission Rock and other Defendants' adoption of RealPage's RMS.

ANSWER TO PARAGRAPH 586: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 587: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

xxix. St. Louis, Missouri

ANSWER TO PARAGRAPH 588: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 589: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 590: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 591: Mission Rock admits that it operates in the St. Louis, Missouri submarket, as defined by Plaintiffs in their Complaint. Mission Rock lacks sufficient knowledge to admit or deny the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 592: Mission Rock denies that any rental increases in the Saint Louis, Missouri submarket were caused by Mission Rock and other Defendants' adoption of RealPage's RMS.

ANSWER TO PARAGRAPH 593: Mission Rock denies there is a cartel but otherwise lacks sufficient knowledge to admit or deny the allegations in this paragraph.

xxx. Tampa, Florida

ANSWER TO PARAGRAPH 594: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 595: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 596: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 597: Mission Rock admits that it operates in the Tampa, Florida, submarket, as defined by Plaintiffs in their Complaint. Mission Rock lacks sufficient knowledge to admit or deny the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 598: Mission Rock denies that any rental increases in the Tampa, Florida submarket were caused by Mission Rock and other Defendants' adoption of RealPage's RMS.

ANSWER TO PARAGRAPH 599: Mission Rock denies there is a cartel but otherwise lacks sufficient knowledge to admit or deny the allegations in this paragraph.

xxxi. Tucson, Arizona

ANSWER TO PARAGRAPH 600: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 601: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 602: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 603: Mission Rock admits that it operates in the Tucson, Arizona submarket, as defined by Plaintiffs in their complaint. Mission Rock lacks sufficient knowledge to admit or deny the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 604: Mission Rock denies that any rental increases in the Tucson, Arizona submarket were caused by Mission Rock and other Defendants' adoption of RealPage's RMS.

ANSWER TO PARAGRAPH 605: Mission Rock denies there is a cartel but otherwise lacks sufficient knowledge to admit or deny the allegations in this paragraph.

xxxii. Washington, District of Columbia

ANSWER TO PARAGRAPH 606: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 607: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 608: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 609: Mission Rock admits that it operates in the Washington, District of Columbia submarket, as defined by Plaintiffs in their Complaint. Mission Rock lacks sufficient knowledge to admit or deny the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 610: Mission Rock denies that any rental increases in the Washington, District of Columbia submarket were caused by Mission Rock and other Defendants' adoption of RealPage's RMS.

ANSWER TO PARAGRAPH 611: Mission Rock denies there is a cartel but otherwise lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 612: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

xxxiii. Wilmington, North Carolina

ANSWER TO PARAGRAPH 613: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 614: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 615: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 616: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 617: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 618: Mission Rock denies there is a cartel but otherwise lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 619: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

xxxiv. Birmingham-Hoover, AL MSA

ANSWER TO PARAGRAPH 620: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 621: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 622: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 623: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 624: Mission Rock denies there is a cartel but otherwise lacks sufficient knowledge to admit or deny the allegations in this paragraph.

xxxv. Buffalo, New York

ANSWER TO PARAGRAPH 625: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 626: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 627: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 628: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 629: Mission Rock denies there is a cartel but otherwise lacks sufficient knowledge to admit or deny the allegations in this paragraph.

xxxvi. Cincinnati, Ohio

ANSWER TO PARAGRAPH 630: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 631: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 632: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 633: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 634: Mission Rock denies there is a cartel but otherwise lacks sufficient knowledge to admit or deny the allegations in this paragraph.

xxxvii. Cleveland, Ohio

ANSWER TO PARAGRAPH 635: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 636: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 637: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 638: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 639: Mission Rock denies there is a cartel but otherwise lacks sufficient knowledge to admit or deny the allegations in this paragraph.

xxxviii. Columbus, Ohio

ANSWER TO PARAGRAPH 640: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 641: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 642: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 643: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 644: Mission Rock denies there is a cartel but otherwise lacks sufficient knowledge to admit or deny the allegations in this paragraph.

xxxix. Hartford, Connecticut

ANSWER TO PARAGRAPH 645: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 646: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 647: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 648: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 649: Mission Rock denies there is a cartel but otherwise lacks sufficient knowledge to admit or deny the allegations in this paragraph.

xl. Riverside, California

ANSWER TO PARAGRAPH 650: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 651: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 652: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 653: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 654: Mission Rock denies there is a cartel but otherwise lacks sufficient knowledge to admit or deny the allegations in this paragraph.

xli. Sacramento, California

ANSWER TO PARAGRAPH 655: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 656: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 657: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 658: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 659: Mission Rock denies there is a cartel but otherwise lacks sufficient knowledge to admit or deny the allegations in this paragraph.

xlii. Salt Lake City, Utah

ANSWER TO PARAGRAPH 660: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 661: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 662: Mission Rock admits that it operates in the Salt Lake City, Utah submarket, as defined by Plaintiffs in their Complaint. Mission Rock lacks sufficient knowledge to admit or deny the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 663: Mission Rock denies that any rental increases in the Salt Lake City, Utah submarket were caused by Mission Rock and other Defendants' adoption of RealPage's RMS.

ANSWER TO PARAGRAPH 664: Mission Rock denies there is a cartel but otherwise lacks sufficient knowledge to admit or deny the allegations in this paragraph.

xliii. San Antonio, Texas

ANSWER TO PARAGRAPH 665: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 666: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 667: Mission Rock admits that it operates in the San Antonio, Texas submarket, as defined by Plaintiffs in their Complaint. Mission Rock lacks sufficient knowledge to admit or deny the remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 668: Mission Rock denies that any rental increases in the San Antonio, Texas submarket were caused by Mission Rock and other Defendants' adoption of RealPage's RMS.

ANSWER TO PARAGRAPH 669: Mission Rock denies there is a cartel but otherwise lacks sufficient knowledge to admit or deny the allegations in this paragraph.

xliv. San Juan, Puerto Rico

ANSWER TO PARAGRAPH 670: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 671: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 672: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

xlv. Virginia Beach, Virginia

ANSWER TO PARAGRAPH 673: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 674: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 675: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 676: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 677: Mission Rock denies there is a cartel but otherwise lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 678: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 679: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 680: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

VII. CLASS ACTION ALLEGATIONS

ANSWER TO PARAGRAPH 681: Mission Rock admits Plaintiffs purport to bring this lawsuit as a class action but denies that class treatment is appropriate and otherwise denies any remaining allegations in this paragraph.

ANSWER TO PARAGRAPH 682: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 683: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 684: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 685: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 686: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 687: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

ANSWER TO PARAGRAPH 688: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 689: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 690: Mission Rock lacks sufficient knowledge to admit or deny the allegations in this paragraph.

VIII. ANTITRUST INJURY

ANSWER TO PARAGRAPH 691: To the extent the allegations in this paragraph are legal conclusions, no responsive pleading is required. Insofar as any responsive pleading required, Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 692: To the extent the allegations in this paragraph are legal conclusions, no responsive pleading is required. Insofar as any responsive pleading required, Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 693: To the extent the allegations in this paragraph are legal conclusions, no responsive pleading is required. Insofar as any responsive pleading required, Mission Rock denies the allegations in this paragraph.

IX. CONTINUING VIOLATION

ANSWER TO PARAGRAPH 694: To the extent the allegations in this paragraph are legal conclusions, no responsive pleading is required. Insofar as any responsive pleading required, Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 695: Mission Rock admits that the Complaint makes these allegations but denies these allegations and on that basis denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 696: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 697: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 698: To the extent the allegations in this paragraph are legal conclusions, no responsive pleading is required. Insofar as any responsive pleading required, Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 699: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 700: Mission Rock denies the allegations in this paragraph.

X. CLAIMS FOR RELIEF

COUNT I

Price Fixing in Violation of Section 1 of the Sherman Act (15 U.S.C. § 1)

ANSWER TO PARAGRAPH 701: Mission Rock incorporates its answers to the preceding paragraphs identified as if fully herein.

ANSWER TO PARAGRAPH 702: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 703: To the extent the allegations in this paragraph are legal conclusions, no responsive pleading is required. Insofar as any responsive pleading is required, Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 704: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 705: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 706: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 707: Mission Rock denies the allegations in this paragraph.

COUNT II
Violation of State Antitrust Statutes
(On behalf of Plaintiffs and the Class)

ANSWER TO PARAGRAPH 708: Mission Rock incorporates its answers to the preceding paragraphs identified as if fully herein.

ANSWER TO PARAGRAPH 709: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 710: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 711: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 712: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 713: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 714: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 715: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 716: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 717: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 718: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 719: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 720: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 721: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 722: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 723: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 724: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 725: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 726: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 727: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 728: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 729: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 730: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 731: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 732: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 733: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 734: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 735: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 736: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 737: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 738: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 739: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 740: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 741: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 742: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 743: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 744: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 745: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 746: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 747: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 748: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 749: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 750: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 751: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 752: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 753: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 754: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 755: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 756: Mission Rock denies the allegations in this paragraph.

ANSWER TO PARAGRAPH 757: Mission Rock denies the allegations in this paragraph.

XI. PRAYER FOR RELIEF

ANSWER TO PRAYER FOR RELIEF: Mission Rock denies Plaintiffs' prayer for relief and specifically denies that any relief for Plaintiffs' is justified. Mission Rock prays for a judgment that Plaintiffs take nothing by way of their complaint.

ANSWER TO JURY DEMAND: Mission Rock states that certain named Plaintiffs and unnamed class members have signed valid and enforceable jury waivers, which Mission Rock intends to enforce.

AFFIRMATIVE DEFENSES

Mission Rock asserts the following affirmative defenses. By setting forth these affirmative defenses, Mission Rock does not assume any burden of proof as to any fact issue or other element

of any cause of action that properly belongs to Plaintiffs. Mission Rock reserves the right to amend or supplement its affirmative defenses.

FIRST DEFENSE

(LEGITIMATE BUSINESS JUSTIFICATIONS)

Some or all of Plaintiffs' claims and those of the alleged class are barred, in whole or in part, because at all times Mission Rock's conduct was reasonable and its actions were undertaken in good faith to advance legitimate business interests and had the effect of promoting, encouraging, and increasing competition.

SECOND DEFENSE

(UNDAMAGED AND UNINJURED CLASS MEMBERS)

To the extent Plaintiffs and the alleged class seek relief on behalf of purported class members who have not suffered any damages or injury, the Complaint and each of its claims for relief violate Defendants' right to due process under the Constitution.

THIRD DEFENSE

(WAIVER)

Plaintiffs' claims and those of the alleged class are barred, in whole or in part, by the doctrine of waiver, including because Plaintiffs and putative members of the alleged class continued to rent properties from Defendants and other property owners and managers who implemented RealPage's RMS, after learning of the alleged anticompetitive conduct. Plaintiffs continued to enjoy the benefits of renting from Defendants. Plaintiffs' continued rental of

Defendants' properties at what they now allege are prices above the competitive level manifest an intention to waive any right to bring this suit and are inconsistent with any other intention. Plaintiffs, by their actions, accepted the benefits of an ongoing relationship with Defendants and relinquished their rights to bring suit. Accordingly, the doctrine of waiver bars Plaintiffs' claims, in whole or in part.

FOURTH DEFENSE

(ABSENCE OF ANTICOMPETITIVE EFFECTS)

RealPage's RMS, and Defendants who implemented this software, does not violate the antitrust laws because it caused no anticompetitive effects.

FIFTH DEFENSE

(PROCOMPETITIVE EFFECTS)

RealPage's RMS, and Defendants who implemented this software, does not violate the antitrust laws because it caused no anticompetitive effects. Some or all of Plaintiffs' claims are barred because all of Mission Rock's conduct challenged by Plaintiffs was lawful, fair, non-deceptive, expressly authorized by law, justified, and pro-competitive; it constituted a bona fide business practice consistent with industry practices and was carried out in furtherance of legitimate business interests; and it was an essential part of Mission Rock's lawful business operations.

SIXTH DEFENSE
(MARKET DEFINITION)

Plaintiffs do not allege, and is unable to provide, a cognizable and relevant geographic market.

SEVENTH DEFENSE
(MARKET POWER)

Plaintiffs cannot show that Defendants are dominant in any relevant market.

EIGHTH DEFENSE
(Failure To State A Claim)

Plaintiffs' claims are barred in whole or in part because Plaintiffs' Second Amended Consolidated Class Action Complaint fails to state facts upon which relief can be granted.

NINTH DEFENSE
(Statute of Limitations)

Plaintiffs' claims are barred, in whole or in part, by the applicable statute of limitations. To the extent Plaintiffs seek to bring claims outside the applicable statute of limitations, Plaintiffs' Complaint is time-barred. To the extent that Plaintiffs' Complaint relies on information made public more than four years ago, Plaintiff's Complaint is time-barred.

TENTH DEFENSE
(No Statutory injury)

Plaintiffs' claims are barred, in whole or in part, because Plaintiffs have not suffered any injury in fact or any injury cognizable under the antitrust laws. Plaintiffs' alleged harm lies in their speculation that many companies colluded seamlessly through a conspiracy, resulting in their harm. In essence, Plaintiffs complain about the impact of naturally unpredictable changes in the market conditions that exist in the global, national, and local economy. To the extent that Plaintiffs maintain that they were injured by these events, such an injury is not cognizable under the antitrust laws.

ELEVENTH DEFENSE

(Failure To Mitigate)

Plaintiffs' claims are barred, in whole or in part, because Plaintiffs failed to exercise reasonable care to mitigate any damages they may have suffered. To the extent Plaintiffs believed that Mission Rock agreed to use RealPage Revenue Management software and that such agreement had the effect of raising rental prices above competitive levels, Plaintiffs had an obligation to mitigate their damages by seeking other sources of supply, including from other property managers or owners. Plaintiffs' failure to exercise reasonable care to mitigate damages was the complete or partial cause of any damages Plaintiffs may have suffered.

TWELFTH DEFENSE

(Lack of Proximate Cause & Intervening/Superseding Conduct)

Plaintiffs' claims are barred, in whole or in part, because any alleged injuries and damages either were not legally or proximately caused by any acts or omissions of Mission Rock or were caused, if at all, solely and proximately by Plaintiffs' conduct or by the conduct of third parties

including, without limitation, the prior, intervening, or superseding conduct of Plaintiffs or such third parties.

THIRTEENTH DEFENSE

(Laches)

Plaintiffs' claims are barred by the equitable doctrine of laches. Plaintiffs demonstrated an unreasonable lack of diligence in bringing their claims. Plaintiffs' unreasonable lack of diligence in bringing their claims now bars them.

FOURTEENTH DEFENSE

(Consent)

Plaintiffs' claims are barred, in whole or in part, due to their ratification of, and consent to, the conduct of Mission Rock. Plaintiffs' Complaint demonstrates its long-standing ratification of and consent to the complained-of conduct. Accordingly, because Plaintiffs have been aware for years of the very same conduct they now challenge—and because some of that conduct provided Plaintiffs a direct benefit—Plaintiffs' claims are barred by the doctrine of ratification.

FIFTEENTH DEFENSE

(Noerr-Pennington & Free Speech)

Plaintiffs' claims are barred, in whole or in part, to the extent Plaintiffs seeks to impose liability on Mission Rock based on the exercise of any person or entity's right to petition federal, state, and local governmental bodies, including through public statements, because such conduct

was immune under the *Noerr-Pennington* doctrine and privileged under the First Amendment to the U.S. Constitution.

SIXTEENTH DEFENSE

(Arbitration Agreements, Class Action Waivers, or Other Contractual Terms)

Plaintiffs' claims are barred, in whole or in part, to the extent the rental lease agreements pursuant to which Plaintiffs rented their apartments contain arbitration clauses, clauses providing a different forum for the resolution of their claims, or provisions waiving a Plaintiff's ability to bring a representative or class action claim.

SEVENTEENTH DEFENSE

(Right to Set Off Amounts Paid)

Without admitting the existence of any contract, combination, or conspiracy in restraint of trade, and expressly denying same, Plaintiffs' claims are barred, in whole or in part, by non-settling Defendants' right to set off any amounts paid to Plaintiffs by any Defendants who have settled, or do settle, Plaintiffs' claims against them in this action.

EIGHTEENTH DEFENSE

(Contracts Without Any Purported Overcharge)

Without admitting the existence of any contract, combination, or conspiracy in restraint of trade, and expressly denying same, Plaintiffs' claims are barred, in whole or in part, to the extent that Plaintiffs entered into contracts that do not include any purported overcharge.

NINETEENTH DEFENSE

(Improper Damages)

Plaintiffs' claims are barred, in whole or in part, to the extent they seek improper multiple damage awards, and damage awards duplicative of those sought in other actions, in violation of the Due Process guarantees of the Fifth and Fourteenth Amendments of the United States Constitution and of the Eighth Amendment of the United States Constitution.

TWENTIETH DEFENSE

(Acquiescence)

Plaintiffs' claims are barred, in whole or in part, by the Plaintiffs' knowing acquiescence to the alleged restraints of trade alleged in the Complaint.

TWENTY-FIRST DEFENSE

(Damages Reduced by Plaintiffs' Conduct)

Upon information and belief, Plaintiffs' claims are barred, in whole or in part, by Defendants' right to set off any amount paid to Plaintiffs by damages attributable to Plaintiffs' conduct to the extent Plaintiffs unlawfully shared information found to be competitively sensitive regarding their rental lease agreements or potential alternative rental lease agreements.

TWENTY-SECOND DEFENSE

(Lack of Jurisdiction)

Some or all of Plaintiffs' state-law claims cannot be brought against Mission Rock for a lack of jurisdiction. For instance, the laws of the states cited in Count II of the Complaint are not intended

to, and do not, apply to conduct occurring outside of those states, and Plaintiffs' Complaint does not include any Plaintiff from the States of Alaska, Arizona, District of Columbia, Hawaii, Idaho, Indiana, Iowa, Kansas, Louisiana, Maine, Maryland, Michigan, Minnesota, Mississippi, Missouri, Montana, Nebraska, New Hampshire, New Jersey, New Mexico, New York, North Carolina, North Dakota, Ohio, Oklahoma, Oregon, Pennsylvania, South Carolina, South Dakota, Utah, Vermont, Virginia, West Virginia, Wisconsin, and Wyoming.

Many of the state laws allegedly giving rise to Plaintiffs' claims do not apply because the alleged conduct did not occur within or substantially affect the citizens or commerce of the respective states, or because Mission Rock had no specific intent to impact the commerce of those states. As a result, the application of those state laws to Mission Rock's conduct would violate the Due Process Clauses and Commerce Clause of the U.S. Constitution, the principle of federalism, and the constitutions and laws of the respective states at issue.

To the extent that the Complaint seeks to assert claims or obtain relief on behalf of multifamily renters located outside of the jurisdictions governed by those laws, those claims are barred as improper assertions of extraterritorial jurisdiction and any effort to enforce those laws as to residents of other states would violate the Due Process Clause and the Commerce Clause of the U.S. Constitution and various state laws and constitutions.

TWENTY-THIRD DEFENSE

(No Private Right of Action)

Some of Plaintiffs' state-law claims are barred, in whole or in part, to the extent Plaintiffs seek damages under state laws that do not permit recovery of damages by private plaintiffs.

TWENTY-FOURTH DEFENSE

(Failure to Comply with State Law Notice)

Plaintiffs' claims are barred, in whole or in part, to the extent that Plaintiffs failed to comply with the notice requirements under various state laws.

TWENTY-FIFTH DEFENSE

(Incorporating Other Defendants' Defenses)

Mission Rock adopts and incorporates by reference any and all other defenses asserted by any other Defendant to the extent that the defense would apply to Mission Rock.

TWENTY-SIXTH DEFENSE

(Right to Assert Other Defenses)

Mission Rock reserves the right to assert other defenses as this action proceeds up to and including the time of trial.

Dated: February 5, 2024

/s/ Fred B. Burnside

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Residential, LLC*

CERTIFICATE OF SERVICE

I hereby certify that on February 5, 2024, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all attorneys of record registered on the CM/ECF system.

DATED this 5th day of February, 2024.

/s/ Fred B. Burnside

Fred B. Burnside